

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(ALEXANDRIA DIVISION)**

JAY NEDRY, et al.,)
Plaintiffs,)
v.)
GUNNAR NELSON, et al.,) CASE NO.: 1:11-cv-878-LMB/IDD
Defendants.)

)

DECLARATION OF WILLIAM E. CROCKETT
IN SUPPORT OF MOTION TO WITHDRAW

I, William E. Crockett, declare:

1. I am the managing partner of Dion-Kindem & Crockett (“DKC”), counsel of record to Plaintiffs herein. I have personal knowledge of the matters testified to herein, and if called upon to do so, would competently testify thereto.
2. Within the two weeks there has occurred an irreconcilable breakdown in communication between DKC and local counsel, and the Plaintiffs, in the future conduct of the case so that it has been rendered unreasonably difficult for counsel to carry out its employment as counsel for the Plaintiffs. Professional considerations require termination of the representation.

3. Counsel has requested that Plaintiffs either obtain other counsel or execute a substitution of attorney. As of the date of this Motion they have failed to do either.

4. As the specific difficulties rendering the continued representation unreasonably difficult would require a disclosure of confidential and privileged communications with our clients we cannot and will not do so in support of this Motion, absent further order of the Court. In light of the severity of the circumstances, however, counsel will be present at the hearing and will be prepared, within applicable ethical constraints, to further detail the circumstances to the Court *in camera* should the Court deem it necessary.

5. Counsel emphasizes to the Court that the issues causing this Motion are not in the nature of a fee dispute. There is no fee dispute with the Plaintiff.

6. Under the present circumstances counsel cannot adequately represent the Plaintiffs, and it is our professional obligation to withdraw. Therefore, counsel requests the Court grant this Motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 7th day of March, 2012 at Woodland Hills, California.



WILLIAM E. CROCKETT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via ECF, facsimile and regular mail, first class, postage prepaid this 7th day of March, 2012 to:

Robert Draim
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VIA OVERNIGHT MAIL ONLY
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